

AO 91 (rev.11/11) Criminal Complaint

AUTHORIZED AND APPROVED DATE :Mark R. Stoneman, AUSA 2/9/21

United States District Court
for the

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

Christopher James LaFever,

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Case No: M-21-71-AMG

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2, 2020, in Canadian County, in the Western District of Oklahoma, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)(A)

Distribution of Child Pornography

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent, Marisol Flores, Federal Bureau of Investigation, which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.



Complainant's signature

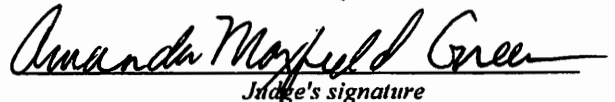
Marisol Flores
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date:

2/9/21

City and State: Oklahoma City, Oklahoma



Judge's signature

Amanda Maxfield Green, U.S. Magistrate Judge
Printed name and title

**THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Marisol Flores, a Special Agent (SA) with the Federal Bureau of Investigation (FBI),
being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) since May 2015, and I am currently assigned to the Oklahoma City Division. Since joining the FBI, I have been involved in investigations of child exploitation matters and computer crimes against children. I am currently assigned to investigate violations of federal law involving the exploitation of children. I have gained expertise in conducting such investigations through in-person trainings, classes, and everyday work in my current role as an SA with the FBI.

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. As shown below, there is probable cause to believe that Christopher James LaFever (LAFEVER) distributed child pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A). I submit this Application and Affidavit in support of a complaint.

4. The statements in this Affidavit are based in part on information provided by the National Center for Exploited and Missing Children (NCMEC), Federal Bureau of Investigation (FBI) personnel detailed to NCMEC, and on my investigation of this matter.

Since this Affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation.

PROBABLE CAUSE

5. On July 20, 2020, NCMEC received information from MediaLab/Kik on their CyberTipline reporting that an individual, using Kik Messenger, uploaded and shared child sexual abuse material (CSAM) numerous times with other users and groups of users. According to Kik, the individual using Kik Messenger to upload and share these files has an email address of diamonddiscgolok@icloud.com¹, a Screen/User Name of 'harry14bear', an ESP User ID of harry14bear_szj, and an IP address of 98.191.193.70 on July 20, 2020. Several of the videos uploaded and shared are described as follows:

On June 28, 2020, at approximately 5:46 pm, Kik username 'harry14bear' uploaded a video file, 7fbb0e99-b7cb-44e5-836f-40afcd379a82.mp4, one minute and eighteen seconds in length, and sent it to another Kik user via private chat messenger from IP address 98.191.193.70. The video begins with a naked prepubescent male on his hands and knees. An unidentified individual is situated behind the prepubescent male and begins to fondle the prepubescent male's erect penis with their left hand. Then the unidentified individual places their hand on the prepubescent male's hips and begins to simulate anal sex.

On July 2, 2020, at approximately 2:02 am, Kik username 'harry14bear' uploaded a video file, 78088f4d-6dd5-4fb6-8e95-f5fe4a8139c6.mp4, one minute and nine seconds

¹ A subpoena was sent to Apple in regards to email address diamonddiscgolok@icloud.com. After a reasonable search, Apple was unable to locate any account(s) associated with the information identified in the legal request, and therefore had no data to provide.

in length, and sent it to another Kik user via private chat messenger from IP address 98.191.193.70. The video begins with a male, of an undetermined age, inserting his erect penis in the anus of a prepubescent male who is lying on a bed with a tan and gray patterned covering. Both the male of an undetermined age and the prepubescent male were not clothed. In the background of the video, a foreign language is being spoken. The prepubescent male's backside was resting on a white and blue striped pillow. During the video, a shadow was observed on the bed and the wall.

On July 2, 2020, at approximately 6:59 pm, Kik username 'harry14bear' uploaded a video file, 664e8219-078d-46f7-b43d-a1a08e04c729.mp4, one minute and fifty-nine seconds in length, and sent it to a Kik messaging group from IP address 98.191.193.70. The video begins with two prepubescent males, one not clothed and one who wore gray boxers with a red waistband, in a room. They both appeared to be handling the filming device during different times of the video. The video progressed to both prepubescent males fondling each other's erect penises. The prepubescent male with the gray boxers then engaged in oral sex with the other prepubescent male. At the end of the video, both prepubescent males looked into the filming device.

6. Pursuant to a subpoena, Cox Communication provided information in regards to IP address 98.191.193.70 between the dates of September 25, 2019, to September 25, 2020, as follows:

Name: J & J Survey Inc-Home Office

Address: 819 N Sara Rd, Mustang, OK 73064-4550

Home Phone: 405-630-7101

Work Phone: 405-556-1737

Comment: Lynn Lafever

7. Open source research revealed Christopher James Lafever (LAFEVER) as a resident of 819 N Sara Rd, Mustang, Oklahoma, the SUBJECT PREMISES. In 2012, LAFEVER was convicted for online solicitation of a minor for sexual conduct in Collin County, Texas, case no. 296-81452-2011². In 2013, LAFEVER was convicted for soliciting sexual conduct or communication with a minor in Coal County, Oklahoma, case no. CF-2011-30. In 2013, LAFEVER was also convicted for unlawful communication with a minor by use of technology in Canadian County, Oklahoma, case no. CF-2011-42. LAFEVER is registered as a sex offender with the address of the SUBJECT PREMISES.

8. LAFEVER was issued an Oklahoma driver's license on November 8, 2019, with the address of 819 N Sara Rd, Mustang, Oklahoma 73064, the SUBJECT PREMISES.

9. On January 21, 2021, law enforcement installed a pole camera to view the public areas of the SUBJECT PREMISES. On January 22, 2021, investigators observed a male, matching the description of LAFEVER³, go inside the SUBJECT PREMISES. After a short time, LAFEVER exited the SUBJECT PREMISES and departed in a blue Ford truck bearing Oklahoma license plate 0964-THD⁴. After review of the pole camera from January 21, 2020¹ – January 29, 2021, law enforcement officers have determined that

² LAFEVER's victim in the investigation was a juvenile male.

³ Investigators had access to LAFEVER's photos and identifiers from his driver's license and the Oklahoma Department of Corrections Offender Search website <https://okoffender.doc.ok.gov>.

⁴ Investigators have seen the blue Ford truck, bearing Oklahoma license plate 0964-THD, parked at the residence on several occasions.

LAFEVER parks his blue Ford truck on the west side of the SUBJECT RESIDENCE behind the shop overnight and other times throughout the day, both weekdays and weekends. Law enforcement officers also observed that the vehicle LAFEVER's parents drive, a silver Ford F-150 bearing Oklahoma license plate AAU-329, arrives mid-morning during weekdays, and departs in the early evenings during the weekdays. LAFEVER's parents park their vehicle in front of the main residence of the SUBJECT RESIDENCE. The vehicle LAFEVER's parents drive was not observed at the SUBJECT RESIDENCE during the weekend. Also of note, the SUBJECT RESIDENCE is listed as the address for J&J Survey, the business LAFEVER's family owns.

10. On February 3, 2021, this Court issued a search warrant for the SUBJECT RESIDENCE. On February 9, 2021, agents executed the search warrant.

11. On February 9, 2021, at approximately 9:30 am, agents conducted a non-custodial interview of LAFEVER. During the interview, LAFEVER admitted that he uses the internet to request and distribute child pornography. He told agents that he uses Kik Messenger under the screen name harry14bear. He told agents he uses Kik to share videos and images of males between the ages of ten and seventeen engaged in oral sex and masturbation. He told agents that he primarily uses an iPhone but also uses a Samsung phone to store his collection of such images and videos.

12. During the search of the SUBJECT RESIDENCE, agents found an iPhone and Samsung smart phone. During a preliminary search of the two phones, agents observed multiple images and videos depicting child pornography. One example found on the Samsung phone was a thumbnail of a video depicting a prepubescent female, wearing a

blindfold, performing oral sex on adult male. One example found on the iPhone was an image depicting an approximately 12-year-old boy lying on couch exposing his penis.

13. On February 9, 2021, at 12:00 pm, agents placed LAFEVER under arrest.

CONCLUSION

14. Based on the aforementioned factual information, this Affiant respectfully submits that there is probable cause to believe that Christopher James LAFEVER distributed child pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A).

15. This Affiant, therefore, respectfully requests a complaint issue for Christopher James LAFEVER.



MARISOL FLORES
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Signed and sworn before me this 9th day
of February 2021.



AMANDA MAXFIELD GREEN
UNITED STATES MAGISTRATE JUDGE